

# Valli Kane & Vagnini

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May 21, 2020

**VIA ECF**

The Honorable Sanket J. Bulsara  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Macas v. Alex's Auto Body 1 Inc., et al.**  
**Dkt. No. 1:18-CV-07184 (RJD)(SJB)**

Dear Judge Bulsara:

We represent Plaintiff Freddy V. Macas (“Plaintiff”) in the above-captioned matter. We write jointly with Defendants Alex’s Auto Body 1 Inc. and Alexander Khaimov (collectively, “Defendants”) to seek an extension of time of the discovery deadline currently set for May 29, 2020. The parties request a three (3) month extension to August 28, 2020.

The reason for the request is due to the COVID-19 pandemic which has resulted in an inability to effectively meet with our clients at this time and gather information related to discovery. Further, the parties are continuing to work on paper discovery which has proven difficult given the limitations imposed as a result of the pandemic. This is our first request for an extension related to the discovery deadline and Defendants consent to the request.

Thank you for your courtesies in this matter.

Respectfully Submitted,

*/s/ Robert R. Barravecchio*  
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Cc: Counsel of record (*via ECF*)